

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

CIVIL NO. 12-2039 (GAG)(PG)

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.

Defendants.

**EXTENSION OF TIME TO PROVIDE COMMENTS TO THE TCA'S PRELIMINARY
SIX-MONTH REPORT AND ON THE TCA'S PRELIMINARY SPECIAL REPORT ON
CROWD CONTROL**

TO THE HONORABLE COURT:

COME NOW the Commonwealth of Puerto Rico and The Puerto Rico Police Bureau, through the undersigned counsel, and respectfully allege and pray as follows:

1. On November 16, 2017, an in-camera status conference was held in this case to update and inform this Honorable Court on all pending matters, as well as to set a realistic date for the next public status hearing in 2018. (See Docket No. 632). On that same date, the Court ordered that a joint proposed timetable of all the deadlines agreed upon and/or set by the Court at the status conference be filed by the next day before noon. (See Docket Nos. 639 and 640).

2. On November 17, 2017, this Honorable Court issued an order setting a timetable based on the discussion held in the in-camera status conference on all pending matters. Specifically, the Court ordered that Defendants to provide comments on the TCA's Preliminary Six-Month Report, pursuant paragraph 252 of the Agreement by

January 11, 2018 and to provide comments on the TCA's Preliminary Special Report on crowd control on January 12, 2018. (See Docket No. 644).

3. On January 10, 2018, in light of the resignation of Colonel Michelle Hernandez De Fraley as Police Commissioner, the Commonwealth informed this Honorable Court of the appointment of interim Police Commissioner Henry Escalera. (See Docket No. 695).

4. In order for the newly appointed Police Commissioner to have enough time to revise both reports, the Commonwealth requests that this Honorable Court grant an extension of time for the PRPB to provide its comment on both reports January 17, 2018. Prior to drafting this motion, the undersigned contacted both the TCA and USDOJ, on the Commonwealth's intention to seek an extension of time, and no objections were raised.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and grant this instant motion for an extension of time, until January 17, 2018, to provide comments to the TCA's Preliminary Six-Month Report, pursuant paragraph 252 of the Agreement and on the TCA's Preliminary Special Report on crowd control.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on January 11, 2018.

WANDA VÁZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS

Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN
Director of Federal Litigation
and Bankruptcy Division

S/JOEL TORRES ORTIZ

Joel Torres Ortiz
U.S.D.C. NO. 302311
Federal Litigation Division
Department of Justice

P.O. Box 9020192
San Juan, P.R., 00902-0192
Tel. (787) 721-2900, ext. 2647,2650,2624,2606
Fax (787) 723-9188
joeltorres@justicia.pr.gov